UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA SOUTH BEND DIVISION

KASTURI HALDAR,)	
Plaintiff,)	Case No.: 3:24-cv-836-CCB-SJF
v.)	
UNIVERSITY OF NOTRE DAME)	
DU LAC, SANTIAGO SCHNELL, and)	
CINDY PARSEGHIAN)	
)	
Defendants.)	

Exhibit A In Support of Defendant's Response to Plaintiff's Emergency Motion for Reconsideration

Declaration of Dean Santiago Schnell

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA SOUTH BEND DIVISION

KASTURI HALDAR,)
Plaintiff,) Case No.: 3:24-cv-836
V.)
UNIVERSITY OF NOTRE DAME DU LAC, SANTIAGO SCHNELL, and)
CINDY PARSEGHIAN)
Defendants.)

DECLARATION OF DEAN SANTIAGO SCHNELL

- I, Santiago Schnell, DPhil, declare, pursuant to 28 U.S.C. §1746, under penalty of perjury, that the following facts are true and correct:
- 1. I am the William K. Warren Foundation Dean ("Dean") of the College of Science ("the College") at the University of Notre Dame ("Notre Dame" or the "University"), and also am a tenured Professor at Notre Dame. I was appointed Dean of the College effective September 1, 2021, and since that time I have been a tenured Professor of Biological Sciences and have a concurrent appointment in Applied & Computational Mathematics & Statistics at the College.
- 2. Since at least the date of my notice to Dr. Haldar that the University intended to decommission her laboratory, I have asked the College's Senior Director of Strategic Initiatives, Allison Slabaugh, to work with Alejandro Lopez-Ramirez, Dr. Rebecca Wingert, Director of Graduate Studies for the Department of Biological Sciences, and the University's Attending Veterinarian to determine what steps need to be taken to assist Mr. Lopez-Ramirez in finishing his PhD studies in 2025.

3. In addition to her service to the College in her role as Director of Graduate Studies, Dr. Wingert runs a laboratory in the College that studies Non-Ketotic Hyperglycinemia (NKH), a rare disease, among other research interests and programs.

4. In my capacity as Dean of the College and in concert with my instructions, Mrs. Slabaugh has reported to me the following information:

a. Dr. Wingert officially became Mr. Lopez-Ramirez's dissertation advisor on November 19, 2024.

b. After December 12, 2024, the specially-bred mice Mr. Lopez-Ramirez studies for his dissertation work on the NKH disease will remain in the Freimann Life Science Center and will be moved to Dr. Wingert's lab as needed for Mr. Lopez-Ramirez's studies and will be housed at the College's cost.

c. Mr. Lopez-Ramirez reported to Dr. Wingert that he anticipates experiments on the specially-bred mice should be complete by April 2025.

d. On November 27, 2024, Mr. Lopez-Ramirez provided a list of equipment and mice necessary to complete his experiments and his dissertation. I am making arrangements, at no cost to Mr. Lopez-Ramirez, to meet his equipment and animal needs.

5. Mr. Lopez-Ramirez continues to receive his stipend and will continue to receive it at least through May 15, 2025.

Executed on the as of the date indicated below.

Santiago Schnell, DPhil

December 2, 2024